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August 27, 2024

VIA ECF

Honorable Lewis A. Kaplan
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Honorable George B. Daniels
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Michelle Bond, No. 1:24-cr-000494 (GBD)

Dear Judge Kaplan and Judge Daniels:

We are the attorneys for Michelle Bond in this matter, currently pending before Judge Daniels. We filed notices of appearance this afternoon.

On August 26, 2024, the government sent a letter to Your Honors arguing that this case is factually related to a matter pending before Judge Kaplan, *United States v. Ryan Salame*, 22-cr-000673 (LAK). We respectfully disagree. The case against Ms. Bond stands on its own, and the charged conduct differs substantially in substance and degree from the charges against Mr. Salame. The charges against Mr. Salame are more far-reaching, broader, and more integrally interconnected to the organization at issue. The case against Ms. Bond, on the other hand, is more straightforward, and the organization at issue is not a central element of the charges, aside from the fact that Ms. Bond had a relationship with Salame. However, should the respective Courts consider transferring this matter, Ms. Bond requests an opportunity to be heard.

In the meantime, Ms. Bond is prepared to proceed to arraignment immediately, at Judge Daniels' earliest convenience.

Respectfully submitted,

/s/ Melissa S. Geller
Melissa S. Geller

Duane Morris

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Cc: All parties of record (via ECF)